

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

**VBR TOURS, LLC,**

**Plaintiff,**

**v.**

**NATIONAL RAILROAD PASSENGER  
CORP., and YANKEE LEISURE GROUP,  
INC.**

**Defendant.**

**Case No.: 14-CV-00804**

**DEFENDANT NATIONAL RAILROAD PASSENGER CORP.'S MOTION TO DISMISS  
PLAINTIFF'S COMPLAINT FOR FAILURE TO STATE A CLAIM**

Defendant National Railroad Passenger Corp. ("Amtrak"), by its attorneys Reed Smith LLP, respectfully submits this Motion to Dismiss Plaintiff VBR Tours, LLC's ("Plaintiff") Complaint for Failure to State a Claim pursuant to Federal Rule of Civil Procedure 12(b)(6). The grounds in support of this Motion are set forth in Amtrak's Memorandum of Law in Support of Its Motion to Dismiss Plaintiff's Complaint for Failure to State a Claim, which is filed simultaneously herewith.

**WHEREFORE**, Amtrak respectfully requests that this Court dismiss the Complaint with prejudice.

Date: April 21, 2014

Respectfully submitted,

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